

STATE OF NEW JERSEY

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SUPERIOR COURT

) LAW DIVISION
) UNION COUNTY
) DOCKET # L-97231-88

-----X
SOLVENTS RECOVERY SERVICE :
NEW ENGLAND, INC., AND :
SOLVENTS RECOVERY SERVICE OF :
NEW JERSEY, :

Plaintiffs, :

VS. :

EXCESS INSURANCE COMPANY, :
HOME INSURANCE COMPANY, ET :
AL, :

Defendants. :
-----X



SDMS DocID 550347

DEPOSITION OF THOMAS RALPH
THERIAULT, TAKEN BEFORE LEE ANN BIANCUCCI,
R.P.R., A NOTARY PUBLIC IN THE STATE OF
CONNECTICUT, PURSUANT TO SUBPOENA, AT THE HOWARD
JOHNSON MOTEL, ROUTE I-84 AND CONN. 10,
SOUTHINGTON, CONNECTICUT, ON NOVEMBER 12, 1990,
AT 1:28 P.M.

Lee Ann Biancucci, R.P.R.
Brandon Reporting Service
450 Main Street
Hartford, CT 06103
(203) 549-1850

1 pit?

2 A Sherman-Tomasso sand pit. Located in Southington?

3 Q I believe so.

4 A Sherman-Tomasso sand pit, yes.

5 Q Do you know exactly where that sand pit was
6 located?

7 A Yes, it's off of DePaolo Drive off of West Street.
8 DePaolo Drive is off of West Street. The sand pit
9 is off of DePaolo Drive.

10 Q Was there a landfill located near this location?

11 A Yes.

12 Q Is that the new landfill?

13 A It has since been closed.

14 Q Was this the landfill that was in operation prior
15 to 1967?

16 A No. This is the one that opened in '67 after the
17 other one was closed. This is the one that just
18 closed recently. I don't know how long ago. Maybe
19 a few years back.

20 Q Just to be clear, the landfill close to this sand
21 pit is the one that opened in 1967, approximately,
22 and was recently closed?

23 A Yes.

24 Q Did you ever observe any waste coming in from the
25 Solvents Recovery plant?

23

1 MS. MARTIN: To which plant?

2 Q (By Mr. Nitti) The one on Old Turnpike Road.

3 A From Solvents Recovery plant, yes.

4 Q How did you have occasion to see these wastes

5 coming in from Solvents?

6 A Well, I knew the contractor was trucking it out of

7 Solvents Recovery, Mastrianni. Most of the time it

8 was Mastrianni Construction Company from Flanders

9 Street.

10 Q Did you ever personally see any of the refuse from

11 Solvents Recovery brought onto the landfill?

12 A Yes.

13 Q How often did you make these observations?

14 A It was usually whenever they brought the stuff in

15 there from Solvents.

16 Q How often was that?

17 A Once, maybe once a month or once every two months,

18 something like that.

19 Q Typically, how large were the shipments that would

20 come in from ~~Solvents Recovery~~?

21 A How much was it?

22 Q Yes.

23 A ~~Probably ten loads or something like that.~~

24 Q ~~How big~~ is a load?

25 A ~~Like a 14-yard truck load or something like that.~~

1 Ten-wheeler dump truck.

2 Q When did you first see these Solvents trucks coming
3 onto the property?

4 A ~~This is the old landfill?~~

5 Q Yes, ~~the old landfill.~~

6 A ~~Probably in the late fifties, around there, '57,~~
7 ~~'58, something like that. Early sixties.~~ It was
8 over a period of years. That's about the late --
9 maybe '57 or something, as far as I can remember
10 back when they started bringing it in there.

11 Q Did the shipments continue up to the time the old
12 landfill was closed in 1967?

13 A They might have stopped bringing it in there for a
14 couple of years before the landfill closed, '65 or
15 something like that. I am not sure. I am not sure
16 whether they kept bringing it in there until the
17 landfill closed or not.

18 Q ~~They continued to bring it in up until 1965?~~

19 A Sixty-five or something like that, ~~probably,~~ '64.

20 Q Did the quantities of the refuse they brought into
21 the landfill, did that ever change during this
22 period of time?

23 A No. It seemed to be about the same, whenever they
24 trucked it in there.

25 Q Do you know what types of materials Solvents was

1 sending to the landfill?

2 A No, I can't say what it was. It looked like a
3 sludge to me, semi-liquid or something. They lined
4 the dump trucks with a plastic stuff and put the
5 stuff into the dump truck and came down and dumped
6 it in there. It was like a semi-liquid, solids in
7 it. I don't know what it was.

8 Q How much liquid would you see during a typical load
9 or off-load?

10 A Typical load, maybe, maybe a third of it and the
11 load would be liquid and the rest would be more
12 like solids. It was -- like I say, it was a
13 semi-liquid. It wasn't all liquid. It wasn't all
14 solids.

15 Q This percentage, was this continuous for all
16 occasions that Solvents Recovery would send trucks
17 onto the property?

18 A Pretty much so.

19 Q You don't know whether or not anyone ever did any
20 testing on that sludge?

21 A No.

22 Q In terms of the actual transportation, could you
23 describe the physical operation of how these trucks
24 would be handled, let's say from the time it first
25 showed up at the front gate?

1 A Usually, we had some trenches dug, like, and they
2 would dump into the trenches. That's -- they would
3 come in the gate and dump it in the trench. As far
4 as them loading it, I never went on their property.
5 I don't know how they loaded it or got it into the
6 truck.

7 Q How deep were these trenches?

8 A What's that?

9 Q How deep were the trenches?

10 A Maybe six feet.

11 Q Fix feet deep?

12 A Yes.

13 Q And the width?

14 A Maybe 15 feet wide, and it was as long as -- just
15 kept digging the trench along.

16 Q Who dug these trenches out?

17 A The Town did.

18 Q Were these trenches dug specifically to accept the
19 refuse from Solvents?

20 A Yes.

21 Q Do you know who made the decision to dig these
22 trenches?

23 A No.

24 Q Were these trenches dug to the period of time of
25 the operation of the landfill?

1 A No.

2 Q When did these trenches --

3 A That's where it gets -- whether it's 1957, '58,
4 around in there. Before that, I don't know. I am
5 not sure when it ended, either, but I would say it
6 was a period after a few years in there between '57
7 and maybe '65, five, six, seven, eight years.

8 Q The trucks would pull up to the front gate and the
9 caretaker, I would assume, would then assign the
10 truck a place to go; is that correct?

11 A Yes.

12 Q At that point, what would happen?

13 A The driver would take the truck to where he was
14 directed and dump the load into this trench.

15 Q Would the trench typically be deep enough or
16 sufficient enough to accept the full load?

17 A Yes. Yes.

18 Q There was no overfilling of a trench before it was
19 able to be flattened out?

20 A No. That's why I say it was about six feet deep or
21 so because we used to throw metal in there, too,
22 like maybe an old washing machine and things like
23 that. Metal trash was dumped in there, too,
24 besides this stuff coming from Solvents.

25 Q Was there a particular part of the property that

1 the trenches for the Solvents refuse were dug?

2 A It was mostly up on the north side of it, of the
3 property, the north -- more like the north end of
4 the landfill.

5 Q Do you know why it was put on the north side?

6 A No. No.

7 Q Was the north side of the property higher than the
8 south side?

9 A No. The north side was lower.

10 Q You testified before that you had noticed leachate
11 coming from the landfill. Did you ever
12 specifically notice leachate coming from these
13 Solvents trenches?

14 A In areas, yes, besides where the trash was being
15 dumped, regular trash, because it was leachate
16 coming from the whole area.

17 Q There was also specific leachate coming from these
18 trenches of Solvents'?

19 A Yes.

20 Q Can you describe the color of the leachate?

21 A It was multi-colored, like brown, blue, yellow,
22 greenish.

23 Q How about the quantity?

24 A Not too much, but enough to notice that it was
25 coming out of the leachate. It was leachate. It

1 wasn't rainwater.

2 Q Was it worse when it rained?

3 A I would say so, yes. The rain soaked in there.

4 Q Did you ever observe the leachate migrate off the
5 landfill?

6 A No. It stayed more or less in the area of the
7 landfill and into the pond. It would flow down the
8 pond because it was sloping down towards the pond.

9 Q Did any excess leachate ever form its own pond?

10 A No.

11 Q Did you ever see Solvents bring any drums onto the
12 property?

13 A (Nodding negatively).

14 Q You have to answer verbally.

15 A No.

16 Q After the Solvents truck would deposit its refuse
17 in this trench, at that point, would it be treated
18 with any substances?

19 A No.

20 Q What would happen to it following its placement?

21 A Being dumped there?

22 Q Yes.

23 A Well, after the trench, which I said was about six
24 feet deep or so, was pretty near up to the level of
25 the ground, then it would be covered up with

1 gravel.

2 Q How long, typically, would it take from the time
3 the trench was first filled to the time it was
4 covered?

5 A I would say it was usually done within a week.
6 Within a week.

7 Q Was the leachate worse prior to the covering of a
8 particular trench?

9 A Yes.

10 Q Once a trench was covered, did you ever notice any
11 leachate at that point?

12 A Not in the area where the stuff was dumped.

13 Q In terms of the covering, how much gravel would you
14 use?

15 A Maybe a foot and a half or two feet.

16 Q Where would you get this gravel from?

17 A Various fill banks around the town, gravel banks.
18 There was one particular one right near the
19 landfill on Old Turnpike Road. There was another
20 one down on Mulberry Street.

21 Q Do you have the names of these?

22 A No.

23 Q Did the Town of Southington own these?

24 A No. The one on Mulberry Street where the Town and
25 Highway Garage was was owned by the Town. The one

1 on Old Turnpike was owned by a private. I guess
2 they paid him for the gravel, the Town paid him for
3 the gravel to cover up the landfill with.

4 Q When the old landfill closed in 1967, what did you
5 do at that point in terms of your duties and
6 responsibilities for the Town?

7 A What did I do?

8 Q Yes.

9 A I was assistant street superintendent.

10 Q Did you ever have occasion to revisit the old
11 landfill?

12 A Yes.

13 Q Are you aware of whether or not a key to the old
14 landfill was ever given to Solvents?

15 A No, I am not aware of that.

16 Q Are you aware of whether Solvents Recovery ever
17 used the old landfill after its official closing?

18 A No.

19 Q Are you aware if anyone used the landfill at that
20 point?

21 A No.

22 Q Have you ever heard of Ace Trucking, Inc.?

23 A Ace Trucking. I think I have.

24 Q Do you know what type of concern they are?

25 A Aren't they trash haulers? I think they are trash

1 haulers.

2 Q Do you know whether or not Solvents ever employed
3 Ace Trucking?

4 A No.

5 Q How about, have you ever heard of the New England
6 Barrel Company?

7 A No.

8 Q When you say previously that Solvents Recovery
9 would come in and deposit their refuse in the
10 landfill, were these Solvents Recovery owned
11 trucks?

12 A No. No. No.

13 Q So these were trucks that were brought onto the
14 property under contract to Solvents Recovery?

15 A Yes.

16 Q How did you know that these were Solvents Recovery
17 contracted trucks?

18 A Well, I knew the contractor who was hauling the
19 stuff from Solvents Recovery, and I knew where it
20 was coming from. I observed them driving down the
21 street. They were coming from Solvents Recovery
22 and bridging the stuff in there.

23 Q That was Mastrianni?

24 A Yes.

25 Q Are you familiar with the Pratt & Whitney plant in

1 A Just about the time they reopened the plant in, I
2 forget just when that plant was reopened. It may
3 have been '50, '51 because they shut it down after
4 the war, around '46 or something. Then they
5 reopened it and it might have been '49, somewhere
6 around there. It's a long time ago. At that time,
7 until the time it closed, they brought trash in.

8 Q Were there any trenches dug for Pratt & Whitney?

9 A No.

10 Q Did you ever notice any leachate coming from any of
11 the materials that Pratt & Whitney had deposited
12 there?

13 A Not in particular, no.

14 Q Were there ever any trenches dug on the landfill
15 for anyone else, other than Solvents Recovery?

16 A No.

17 Q Why were there trenches dug for Solvents Recovery?

18 A Well, the stuff that they were bringing in there,
19 like I told you, it was a semi-liquid stuff. It
20 wasn't all plain liquid. It was like jello almost.
21 If you dumped it on the ground, like -- I don't
22 know how to explain it -- it would kind of
23 flow out so it was hard to contain. That's why we
24 dug the trenches, to keep it in the trench.

25 Q Was it successful?

1 A I would say so, yes, as far as it flowing from the
2 area where it was dumped. It was pretty well
3 contained where it was dumped.

4 Q Did you ever have occasion to see a load of
5 materials from Solvents Recovery that somehow
6 spilled onto the property or otherwise was not
7 placed correctly in the trench?

8 A The trench where it was supposed to be? No, not
9 really. No.

10 Q Were there any peculiar odors, other than those
11 that are typically associated with a landfill --

12 MS. MARTIN: Object. I am sorry.

13 Q (By Mr. Nitti) -- coming from the point of the
14 Solvents Recovery trenches?

15 MS. MARTIN: Objection as to the use of
16 the word, "peculiar."

17 Q (By Mr. Nitti) You can answer if you understand.

18 A I don't understand the question.

19 Q Would it be fair to say that there are odors that
20 come from a landfill?

21 A Would it be fair to say? Yes, there is odors that
22 come from landfills, yes.

23 Q These odors in the landfill, were there any
24 different odors on the part of the landfill that
25 had the Solvents materials as opposed to the other

1 part of the landfill that did not?

2 A My personal opinion, the material that was coming
3 from Solvents was ~~more of a chemical smell as~~
4 ~~opposed to a garbage smell.~~ There are particular
5 smells, but there is a garbage odor and a chemical
6 odor. Do you understand?

7 Q Yes, I do.

8 Was there any other part of the landfill from
9 which this, quote, chemical odor, emanated from
10 that you can recall during any of this period?

11 A No.

12 Q Was the odor worse in the summer?

13 A I wouldn't say so.

14 Q Did anyone ever complain about the odors, any of
15 the neighbors?

16 A Not that I know of.

17 Q You testified earlier, I believe, that you had
18 never seen Solvents Recovery bring any drums onto
19 the property. Do you know whether or not they had,
20 in fact, brought any drums; did they ever tell you?

21 A I don't know whether they did or not.

22 Q Did you ever see any drums on the landfill?

23 A Did I ever see any there?

24 Q Yes.

25 A Empty drums maybe, but not drums with no material

1 in there. No.

2 Q You did see empty drums?

3 A Yes.

4 Q How many empty drums did you see on the landfill?

5 A Not very many.

6 Q One hundred?

7 A Maybe 100.

8 Q During what periods of time did you see these
9 drums?

10 A Over this whole period of time when the landfill
11 was open there.

12 Q Were these drums completely empty, or did they have
13 any substance inside?

14 A Most of them were empty.

15 Q Were these drums closed, or were they open on top?

16 A Some of them were open, and some were closed.

17 Q Did you notice whether or not any of these drums
18 were rusting?

19 A I suppose, yes. Yes.

20 Q Did you notice whether or not any residual contents
21 of these drums were leaking through the rust spots
22 on the drums?

23 A No.

24 Q Do you know who brought these drums on the
25 property?

39

1 A I would say many different contractors.

2 Q Did you ever notice any fires on the property of

3 the landfill?

4 A Yes.

5 Q How many fires did you notice?

6 A Over a period of time, maybe 50.

7 Q So you have seen 50 fires from the time of 1946

8 through 1967?

9 A Yes.

10 Q Do you know what the source of these fires were,

11 typically?

12 A Probably from, I would say they were from household

13 trash being brought in that might have been partly

14 on fire, and then once they got out into the open,

15 it would flair up. If the wind was blowing, it

16 might flair up or something.

17 Q Did you ever notice any fires in the area of the

18 Solvents Recovery trenches?

19 A No.

20 Q Did you ever notice any fires in the area where the

21 drums were kept?

22 A No.

23 Q In terms of the fires, the fires then typically,

24 they involved the burning of household trash?

25 A Yes.

41

1 A It's at 445. About eight-tenths of a mile from
2 Queen Street, if that will help you.

3 Q Are you on the same street then as Solvents
4 Recovery Services facility?

5 A Yes.

6 Q How far are you away from them?

7 A Seven-tenths of a mile or so. About seven-tenths
8 of a mile.

9 Q From 1958, on, when you became the acting
10 superintendent for the Town of Southington, what
11 would you do in a typical day? What was your job?

12 A Supervising street maintenance.

13 Q Still doing the street maintenance?

14 A Yes.

15 Q I believe in your answer -- you were asked whether
16 or not any oil was brought into the landfill, and I
17 believe you said that you supposed that oil was
18 brought in. Do you recall saying that?

19 A (Nodding head affirmatively).

20 Q Why did you say that?

21 A Why did I say that?

22 Q That you suppose the oil was brought in.

23 A I am pretty sure that people were putting oil into
24 their local household trash so if you asked me a
25 question or he asked a question, did I think that

1 there was oil being brought in there, I would
2 assume, I am pretty sure there was.

3 Q Did you ever see any oil being brought in?

4 A No.

5 Q Did anyone ever indicate to you that the pond at
6 the landfill was polluted?

7 A No.

8 Q Did you ever see any indications that the pond was
9 polluted yourself?

10 A That it might be polluted?

11 Q Yes.

12 A Yes.

13 Q What were those indications?

14 A The leachate was running towards the pond, so I
15 assumed there it was polluting the pond.

16 Q Did you ever report this to anybody?

17 A No.

18 Q Did you ever see any representatives or employees
19 of Solvents Recovery Services at the landfill?

20 A No.

21 Q That's all I have. Thank you.

22 MR. NOLAN: I have no questions at this
23 time.

24

25

1 Q Is that capital M small c, C-o-y?

2 A Yes.

3 Q Later on in your testimony, you stated that you
4 believed that Solvents Recovery brought waste to
5 the landfill up until 1964, 1965?

6 A (Nodding head affirmatively).

7 Q Do you have any recollection --

8 MR. NOLAN: Let the record reflect you
9 have to answer verbally.

10 Q (By Mr. Albertson) You have to say yes or no.

11 MR. NOLAN: You were nodding your
12 head.

13 A Yes.

14 Q (By Mr. Albertson) Do you have any recollection of
15 Solvents Recovery bringing refuse or sludge to the
16 landfill after 1965?

17 A After '65?

18 Q Yes.

19 A No.

20 Q Thank you. I have no further questions.

21 MS. BOROCK: No questions.

22

23 CROSS EXAMINATION BY MR. LUAREZ:

24

25 Q Mastrianni, is he still located in the town?

1 Q You live in the town; correct?

2 A Yes.

3 Q Do you recall at any point in time reading that
4 there was some concerns about the landfill?

5 A No.

6 Q As we sit here today, you haven't read anything in
7 any newspaper in the town of Southington that the
8 landfill was of any concern?

9 A No.

10 Q Do you know Mr. Boll at all; B-o-l-l?

11 A B-o-l-l? No.

12 Q Have you ever met any of the principals of SRS;
13 Solvents Recovery Service?

14 A No.

15 Q I have no further questions.
16

17 CROSS EXAMINATION BY MR. MORABITO:
18

19 Q (By Mr. Morabito) Would you be able to identify
20 the Board of Selectmen from, let's say, 1960 to
21 '66, who was on the board?

22 A Mr. Val DePaolo.

23 Q Anyone else?

24 A Arthur DellaVecchia, Joseph Louis who has since
25 deceased.

1 Q Is that it?

2 A Thomas Galick. That's about it.

3 Q You testified before that it was the usual practice
4 for the caretaker at the landfill to direct the
5 truck drivers into the landfill and direct those
6 truck drivers where to deposit their waste. You
7 said sometimes if a truck driver went to the
8 landfill regularly enough, he would know where to
9 dump without direction; is that correct?

10 A Yes, if they were collecting household trash or
11 whatever.

12 Q How about the SRS, Solvents Recovery Service
13 drivers, would they dump undirected at the
14 landfill?

15 A No. No. No.

16 Q You testified before that you actually observed
17 leachate flowing towards the pond on the property;
18 is that correct?

19 A Uh-huh.

20 Q Did you see any leachate actually enter into the
21 pond?

22 A Actually entering into the pond? I think so. Yes.

23 Q What did that look like?

24 A It was colored blue, green, brown.

25 Q Did you see that leachate flowing on top of the

1 water, or -- did it actually flow on top of the
2 water?

3 A Yes.

4 Q I don't think you were quite sure when the Town
5 well near the landfill became operational. My
6 question is, do you know if it became operational
7 before the landfill closed in 1966?

8 A I think it was. I would say yes.

9 Q The trenches that were dug at the landfill to
10 receive the sludge from Solvents Recovery Service,
11 how long did these trenches remain open before
12 sludge was put into the trenches?

13 A Sometimes it would be open a couple of weeks before
14 they put the stuff in there.

15 Q Did you ever notice water collecting at the bottom
16 of the trench before the sludge was put in?

17 A Yes.

18 Q Do you know how deep the water table is at the
19 landfill?

20 A No. No.

21 Q Would it be fair to say that the longer the trench
22 remained open, the more water would flow into the
23 trench, the higher the water would get in the
24 trench?

25 A No.

1 up?

2 A To see it was covered up, yes.

3 Q Did you drive trucks or a bulldozer?

4 A No.

5 Q You just drove a truck in that would have fill in
6 it?

7 A In the early years. Later on, I was more of a
8 supervisor.

9 Q You would just observe?

10 A To see that the trucks were bringing the fill in.

11 Q Other than having the responsibilities to see that
12 the trash was covered up and actually hauling in
13 the fill yourself, did you have any other
14 responsibilities with respect to the landfill?

15 A No.

16 Q It was not your determination to dig trenches for
17 anybody's waste?

18 A No.

19 Q Do you know whose decision that was?

20 A It was the Selectmen.

21 Q That was not Solvents' decision, as far as you were
22 aware?

23 A It wasn't Solvents' decision, no.

24 Q During your earlier testimony, you talked about the
25 area that was used for Solvents' waste. As far as

1 you are aware, was there an actual designated area
2 that was exclusively for Solvents' waste, or was it
3 in and among the rest of the waste in the landfill?

4 A It wasn't amongst the rest of the waste. ~~It was an~~
5 ~~area just for Solvents.~~

6 Q Nothing else was put in that area?

7 A Yes. In the trenches there was, like I said,
8 washing machines and maybe some furniture like
9 chairs, old chairs and bed springs and any pieces
10 of metal, bed springs, stuff like that. Kind of a
11 bulky waste like.

12 Q I believe you testified that the area where the
13 trenches were dug was on the north part of the
14 landfill?

15 A Yes.

16 Q You said that the south end was higher than the
17 north end; is that correct?

18 A Yes.

19 Q Where was the pond?

20 A I would say it was east of the landfill.

21 Q On the east portion of the landfill?

22 A Yes.

23 Q On any of the occasions that you were present when
24 waste from Solvents' was brought to the landfill,
25 did you ever observe them dump or deposit their

1 waste anywhere that they were not directed to do
2 so?

3 A No.

4 Q We discussed earlier waste that came from Solvents
5 and waste that came from Pratt & Whitney, as far as
6 characterizing them as industry. Was there any
7 other industry that you were aware of that used
8 this landfill for any type of waste?

9 A For any type of waste?

10 Q Any of their refuse that they would generate.

11 A Any other industry?

12 Q Correct.

13 A (Nodding head affirmatively).

14 Q Is that yes?

15 A That's yes.

16 Q Are you able to describe any of the waste that
17 other industry would have brought into the
18 landfill?

19 A Mostly metal shavings and things like that, I would
20 say, paper products, wooden skids and things of
21 that nature, stuff from sweeping the floors.

22 ~~Practically all the local industries used the~~
23 ~~landfill, but there has got to be, I don't know how~~
24 ~~many local industries that used it.~~

25 Q So there were a lot of them?

1 Q You said that when the wastes came in the truck
2 from Solvents, I think you testified -- and correct
3 me if I'm wrong -- approximately one-third of the
4 load was liquid and two-thirds was solids; is that
5 correct?

6 A Yes. That's what it looked like.

7 Q You said that there was a plastic liner in the
8 trucks?

9 A Plastic liner in the trucks, yes.

10 Q Did these trucks actually physically dump the waste
11 into the trenches?

12 A Yes.

13 Q Regular dump trucks?

14 A Regular dump truck, yes.

15 Q Did you ever see what happened to those plastic
16 liners?

17 A That usually went into the trench when the truck
18 was dumped, when they opened up the tailgate.

19 Q Did you have any conversations with any of the
20 drivers for Mastrianni about the wastes that they
21 were hauling for Solvents?

22 A No.

23 Q Do you know who supplied the plastic liners that
24 were in the trucks?

25 A No.

1 Q I have no further questions.

2

3 REDIRECT EXAMINATION BY MR. NITTI:

4

5 Q I have a few other questions.

6

7 I believe you testified in response to Miss
8 Martin's questions that there were other materials
9 in the Solvents trenches that were not put there by
10 Solvents; is that correct?

10 A Yes.

11 Q With regard to the total amount of the materials
12 that were eventually put into these trenches, what
13 percentage would you say was put there from
14 Solvents?

15 A Probably about 25 percent.

16 Q So that 75 percent of the materials that eventually
17 went into the trenches were from generators other
18 than Solvents; is that correct?

19 A Yes.

20 Q You had also testified, I believe, that at a
21 certain point in time, you would go out to the
22 Southington Landfill weekly to determine whether or
23 not to cover the trash; is that correct?

24 A Yes.

25 Q Was that as a matter of routine, or were you